

SUPERIOR COURT
OF THE
DISTRICT OF COLUMBIA
Holding a Criminal Term

SUPERIOR COURT OF
DISTRICT OF COLUMBIA
CRIMINAL DIVISION

2012 JUN 28 P 2:54

FILED

Grand Jury Sworn in on February 21, 2012

THE UNITED STATES OF AMERICA	:	Criminal No: 2012 CF1 4519
	:	
v.	:	Violation:
	:	22 D.C. Code, Section 2101;
JONATHAN FULLARD, ALSO	:	22 D.C. Code, Section 1101(a);
KNOWN AS, JONATHAN MASON	:	22 D.C. Code, Section 2104.01;
PDID: 553-709	:	22 D.C. Code, Section 722(a)(6) (2001 ed.)
	:	
	:	(First Degree Murder - Felony Murder - with
	:	Aggravating Circumstances; First Degree
	:	Cruelty to Children; Obstructing Justice)
	:	

The Grand Jury charges:

FIRST COUNT:

On or about March 4, 2012, Jonathan Fullard, also known as Jonathan Mason, within the District of Columbia, in perpetrating and attempting to perpetrate the crime of First Degree Cruelty to Children; as set forth in the second count of this indictment, killed K. M., a twenty month-old child, by beating him with his hands thereby causing injuries from which K. M. died on or about March 5, 2012.

The Grand Jury Further Charges that at the time such murder was committed, the following aggravating circumstances existed: the murder was especially heinous, atrocious, or cruel.

The Grand Jury Further Charges that at the time such murder was committed, the following aggravating circumstances existed: the murder victim was especially vulnerable due to age, or a mental or physical infirmity. (First Degree Murder - Felony Murder, with Aggravating Circumstances, in violation of 22 D.C. Code, Section 2101, 2104.01(b)(4), 2104.01(b)(10)(2001 ed.)).

SECOND COUNT:

On or about March 4, 2012, Jonathan Fullard, also known as Jonathan Mason, did intentionally, knowingly and recklessly torture, beat and otherwise willfully maltreat K. M., a child under 18 years of age, that is, about twenty-months of age, and thereby caused bodily injury. (First Degree Cruelty to Children, in violation of 22 D.C. Code, Section 1101(a) (2001 ed.)).

THIRD COUNT:

On or about March 5, 2012, Jonathan Fullard, also known as Jonathan Mason, did knowingly and corruptly, provide a false name to officers of the District of Columbia Metropolitan Police Department, with the intent to impede the due administration of justice in the homicide investigation involving the death of K. M. (Obstructing Justice, in violation of 22 D.C. Code Section 722(a)(6)(2001 ed.)).

Ronald C. Machen Jr. Law

RONALD C. MACHEN JR.
United States Attorney
in and for the District of Columbia